

NEC EX PARTE OR LATE FILED

NEC America, Inc.

Corporate Networks Group

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March 25, 1997
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Elizabeth Nightingale
Staff Attorney
Federal Communications Commission
Common Carrier Bureau
Network Services Division
2000 M Street, N.W.
Washington, D. C. 20554-1600

RECEIVED

MAR 26 1997

Subject: CC Docket No. 92-237
Administration of The North American Numbering Plan
Carrier Identification Codes (CICs)

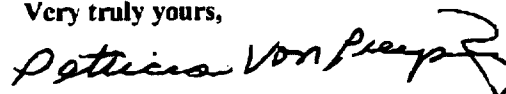
Forwarded to the Commission
March 26, 1997

Dear Elizabeth:

We have responded to each of the questions detailed in your official request dated March 20, 1997 with regard to the above matter.

Please see the following three pages for our response to each of the questions.

Very truly yours,



Patricia Von Preysing
Regulatory Assistant

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FEDERAL COMMUNICATIONS COMMISSION

CC Docket No. 92-237
Administration of the North American Numbering Plan
Carrier Identification Codes (CICs)

March 20, 1997

REQUEST FOR INFORMATION FROM NEC

Please note that the information we seek is intended to be relied upon for inclusion in the public record in CC Docket No. 92-237. This request will also be included in the docket. You may fax your response to Elizabeth Nightingale at (202) 418-2345. Please respond by COB Tuesday, March 25, 1997. We will be responsible for assuring that your response is included in CC Docket No. 92-237. Thank you for your cooperation. If you have any questions, you may call Elizabeth Nightingale at (202) 418-2352.

Please respond to the following questions/requests.

1) What is your estimated share of the PBX market?

1) **ANS.** About 8%

2) When did you have a PBX product available for sale that supports four digit CICs? Please list all your PBX product lines, indicating for each, when the product was available for sale, whether the system has always been four digit CIC capable, and if not, when modification software and hardware to support the change to four digit CICs was made available for sale.

2) **ANS.** The NEAX2400 (Introduced in 1983) and NEAX2000 (Introduced in 1993) have always allowed outgoing dialing patterns translated to a maximum of 24 digits for routing purposes. While the new 4-digit CIC could require dialing 25 digits for some international calls, it is quite improbable that the outgoing routing table within the PBX would need to be based on that many digits. Typically, most routing assignments within the PBX are based on the first 3/6 digits. Allowing a maximum 24 digits for route translation tables ensures no upgrading/customizing will be required for any changes made to dialing plans.

3) What percent of your customers, as of March 1997, have PBX's capable of recognizing four digit CICs (what percent has purchased a PBX that supports four digit CICs or purchased the software necessary to change existing PBXs to support four digit CICs)?

3) ANS. The NEAX2400 and the NEAX2000 have always supported flexible numbering plans. Therefore 100% of our customers have systems that can already accommodate the 4-digit CICs.

4) Of those customers whose systems were not yet capable of recognizing four digit CICs as of March 1997, what percent will need to make software changes and what percent will need to make hardware changes?

4) ANS. Does not apply.

5) Do you inform your customers, or any of your distributors, of the steps necessary to enable their systems or systems they distribute to support four digit CICs? How did/do you inform them?

5) ANS. Again, question does not apply. An NEC certified technician makes the simple programming changes in the routing tables.

6) Hardware Changes:

a) What are the steps necessary for your customers whose PBXs need hardware changes, and do hardware changes always mean system replacement? If not, what other kinds of hardware changes are possible and what percent of customers needing hardware changes actually need system replacement?

Does not apply.

b) ~~Please estimate the cost for such changes and replacement.~~

hardware changes

an estimate of \$_____ per system.

an estimate of time per system_____.

system replacement

an estimate of \$_____ per system.

an estimate of time per system
(installation)_____.

7. Software Changes:

an estimate of \$_____ per system.

an estimate of time per system_____.

7. ANS. Software already supports the new CICs. However, we do not determine what our Associates charge to the end-users for making the programming changes to the customers routing tables.

8) When did your PBX customers upgrade their systems to recognize interchangeable area codes (INPAs)? Did the upgrade include the four digit CIC capability?

8) ANS. There was never a need to upgrade any NEAX2400 or NEAX2000 system to support the interchangeable area codes.

9) When did your PBX customers upgrade their systems to recognize the toll free 888 numbers? Was it the same upgrade as that for INPAs? Did the upgrade include the four digit CIC capability?

9) ANS. Again, it is simple programming changes made to the NEAX2400 or NEAX2000 routing tables. No upgrade was ever required.